

UNITED STATES DISTRICT COURT

for the
Middle District of Pennsylvania

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)
2824 Roosevelt Drive, Chambersburg, PA

Case No. 1:24-mc-00525

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment "A"

located in the Middle District of Pennsylvania, there is now concealed (identify the person or describe the property to be seized):

See Attachment "B"

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☒ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
18 USC 875(c); 18 U.S.C. 922 (g)(3)	Interstate Communications/Threats; Unlawful Poss. of Firearm by Unlawful User of Controlled Substance

The application is based on these facts:

I, Brenda McDermott, a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives, being duly sworn, depose and state:

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Brenda McDermott

Applicant's signature

ATF, SA Brenda McDermott

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by

TELEPHONE

(specify reliable electronic means).

Date: JUNE 21, 2024

Daryl F. Bloom

Judge's signature

JUDGE

City and state: Harrisburg, PA

U.S. Magistrate, Daryl Bloom

Printed name and title

CONTINUATION PAGES IN SUPPORT OF APPLICATION FOR SEARCH WARRANT

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), United States Department of Justice, and have been since so employed since December 2018. I am a graduate of the Federal Law Enforcement Training Center and ATF National Academy. I obtained a bachelor's degree in criminal justice from Temple University in Philadelphia, Pennsylvania. Prior to joining ATF, I was employed for one year with the SEPTA Transit Police Department in Philadelphia, Pennsylvania, where I was assigned to the patrol division.

2. I am currently assigned to the ATF Philadelphia Field Division, Harrisburg Field Office, comprised of ATF Special Agents whose primary responsibilities include investigating individuals or groups who have committed violations of the federal firearms, explosives, and narcotic laws. I have written, participated in, and have acquired knowledge of the execution of search warrants.

3. The information contained in this affidavit is known to me personally or has been relayed to me by other law enforcement officers, or individuals assisting law enforcement officers, as indicated below.

Because this affidavit is being submitted for the limited purpose of securing authorization to search the locations below, I have not included every fact known to me concerning this investigation. I have submitted only those facts and circumstances that I believe establish probable cause to support the issuance of search warrants for the property described herein.

4. Based on the facts set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. 875(c) (Interstate Communications/Threats) and 18 U.S.C. § 922(g)(3) (Possession of a Firearm by Unlawful User of Controlled Substance) have been committed by **Richard LITTLE**. There is also probable cause to search the locations described in Attachment A for evidence, instrumentalities, or fruits of these crimes as further described in Attachment B.

PROBABLE CAUSE

5. Beginning on or around April 4, 2024, the Pennsylvania State Police (PSP) was notified of an incident that occurred at the Franklin County Veteran Affairs Human Resource building, located in Chambersburg, PA. LITTLE became verbally aggressive towards VA

Director Justin Slep, and made the following comments, and left prior to law enforcement arrival.

- a. "I'm going to end you mother fucker"
- b. "Get that mother fucking cock sucker Horst down here now so I can end him too", referring to Commissioner Dean Horst.
- c. "You better watch out you piece of shit"

6. On or about June 17, 2024, ATF received information regarding Richard LITTLE. ATF received information from the PSP and the Franklin County Sheriff's Office of recent social media posts, photographs, and videos on LITTLE's Facebook profile. Law enforcement believe the social media posts were triggered by an eviction notice that LITTLE received on June 10, 2024.

7. ATF was notified due to the threatening nature of the posts and the direct threats being made to Pennsylvania Senator Doug Mastriano, Franklin County Commissioner Dean Horst, and United States Army Sgt. Major Sean Livolsi.

8. ATF reviewed LITTLE's Facebook page, an open-source social media page, and observed¹ the following.

9. On or about June 10, 2024, at approximately 10:43 a.m., LITTLE posted a photograph of a firearm, more specifically the firing pin of the firearm, with a caption of "Nobody around here wants to enforce federal law? Kill switch engaged. Come evict me. I'm ready".

10. On or about June 10, 2024, at approximately 10:48 a.m., LITTLE posted two photographs of a handgun, bearing S/N: G000037, with the caption of "The day I bought her so many years ago I knew, I knew there would come a day she and I would have our time together, Added a 3 ozs to her and she shoots like a 9mm now, no jump nothing, just 3 beautiful taps of 45 Acp, no sight adjustment, just straight laser fire, I love this weapon."

a. ATF conducted a query of the firearm's serial number and determined that LITTLE purchased a pistol bearing S/N: G000037 on September 1, 2010, from Hoover's Outfitting located at 2099 Garrett Road, Rockwood, Pennsylvania.

¹ The quotes and/or transcriptions of the videos are not inclusive of all statements made by LITTLE for the duration of the videos posted.

b. ATF conducted a firearms query through law enforcement databases which indicated LITTLE has purchased and currently is the registered owner of multiple firearms. In addition, LITTLE has an active concealed carry permit in Franklin County that allows LITTLE to conceal carry firearms on his person and inside a vehicle.

11. On or about June 10, 2024, at approximately 11:00 a.m., LITTLE posted a photograph of a AR-style pistol, with the caption of “It’s time... Mike Gregory, can ya get my 45-70 back to me in working order soon? If imma engage county tyrants, I wanna use a federal round, Irony, I love it (smiling emoji).”

12. On June 10, 2024, at approximately 11:05 a.m., LITTLE posted a video on his Facebook page, with the caption “I’m done (tagging PA Senator Doug Mastriano) You and your bullshit created this, don’t you fucking forget it. Come get me Sean, you fucking pussy. Come get me.” Moreover, in the video:

a. LITTLE states in the beginning, “I just want you to know Sean Livolsi ... This is the fucking war you wanted you piece of shit.... this ain’t half of it ... I just started ... as you can see I’ve

been waiting for this day for two year. I've been doing nothing but planning this fucking day." LITTLE makes these statements while displaying multiple firearms on his bed, and numerous boxes of ammunition on the floor of his bedroom.

b. LITTLE moves throughout his apartment while videotaping. LITTLE moves to the living room area, where more firearms are displayed on top of the couch. A small section of the couch is seen propped up on its side that would allow an individual to hide behind. LITTLE moves into the kitchen area, where more firearms are displayed, and he described "kill zones" while looking out the rear window. LITTLE picks up an AR-style pistol from the kitchen counter and refers to it as "my little buddy". LITTLE states "I've been waiting for this day for a while Sean Livoli".

13. On or about June 10, 2024, at approximately 11:35 a.m., LITTLE posted a video on his Facebook page.

a. LITTLE moves throughout his apartment while multiple firearms are on display. LITTLE expresses his frustration with the federal government and continues to express his anger towards Sean Livolsi. LITTLE states, "I've had two years to think

about this and plan for it Sean . . . first what we got here is a nice little 500 / .50 caliber.” LITTLE picks up the revolver from the couch and points the camera at the front door. LITTLE states, “your boys if they make it . . . guaranteed they’re shit ain’t gonna stop the 500 at about 2-3 feet . . . and then after I unload that what your gonna have is the door buster . . . that bullet is going to rip through them and spray blood through the boys (LITTLE simulates firing rounds verbally).”

b. LITTLE then moves back to the kitchen area and picks up what appears to be an AR-style 9mm pistol. LITTLE states “it will be waiting...I made that bad boy...not fully automatic as you can see (LITTLE manipulates the selector switch)... that mother fucker shoots straight lasers at night.” LITTLE then picks up another rifle which he calls “the Trumper”. LITTLE describes another “kill zone” while holding the firearm and points the camera out the kitchen side window. LITTLE states “take out the engine block with that wonderful Donald Trumper (referencing the firearm).”

c. LITTLE moves to the rear of the apartment and states, “you can also see Sean, look at beautiful kill zone, bring your fucken vehicles cause if that’s how you want to play it . . . I’ll kill your vehicles . . . and look what I have waiting...of course I got the 9mm.”

d. LITTLE picks up another firearm from the kitchen table which appears to be an AR-style pistol. LITTLE states “come on Sean . . . Sean . . . if I’m going down in blaze of glory . . . baby come on.” LITTLE pulls the magazine from the pistol and shows the magazine is loaded and references the ammunition to a “.357 hunting round.” LITTLE states, “that mother fucker will rip through anything you got . . . up to “Class 3, I believe . . . especially here . . . I take out your vehicles and I’m just going to be sitting here popping you mother fuckers (LITTLE simulates firing rounds verbally).”

e. LITTLE picks up a handgun from the kitchen table and references it as a “desert eagle.” LITTLE expresses that he is in possession of “special bullets” and refers to hollow point ammunition that is used by law enforcement and then goes on to

state “your Class 2 don’t mean shit to me . . . so I suggest you boys get ready”.

f. At the end of the video, LITTLE states, “as you can see... I’ve been waiting for this mother fucking day buddy... Part 2 bitch... I guarantee I’ll kill your squad of yours as well but this time we ain’t training mother fucker... See you soon bitch.”

14. On or about June 21, 2024, at approximately 7:30 a.m., LITTLE posted on his Facebook page, “(tagging Senator Doug Mastriano) You ruin one more person I will wear your fucking flesh. You are done you piece of shit, leave now or don’t. But you will leave today. Or you will not be found Monday Senator. Make your fucking choice.”

15. On the same day, approximately one hour later, LITTLE posted on his Facebook page a video. During the video he states “I got to see my wife yesterday... Baby girl is so fucked up she pulled all her eye lashes out... and you mother fuckers think there ain’t gonna be blood (LITTLE starts laughing)... I’m gonna god damn pull everything off you mother fuckers (LITTLE starts laughing again)... and I’m gonna give it to baby girl as a present... You fucked up boy... you fucked up.”

16. As described above, LITTLE posted multiple photographs, videos, and comments displaying multiple firearms. More specifically, LITTLE physically picks up the firearms and describes in detail the type of caliber and potential damage that can occur when fired at individuals wearing different class types of body armor. LITTLE describes “his plan” on what will happen to the individuals who try to evict him and even simulates firing a firearm verbally in multiple videos. Based on the information known in the investigation thus far, your affiant believes that LITTLE stores his firearms inside his residence, vehicles, and/or other structures attached to the curtilage of the residence. Law enforcement has conducted physical surveillance of LITTLE’s residence and also observed the residence through the multiple videos posted on Facebook by LITTLE.

17. Based on my training and experience, individuals involved in making these types of threats often possess firearms, firearm parts/accessories, and ammunition as a tool to threaten, intimidate, and create fear towards the intended threatened individuals. In addition, those who commit these threats often feel the need to protect themselves by having firearms in close proximity to themselves at all times. More

specifically, not just on their person, or residence, but inside their vehicle as well. By having a concealed carry permit, your affiant believes that LITTLE utilizes his vehicle as well to possess and transport firearms outside of his residence.

18. In addition, LITTLE utilizes his social media, more specially Facebook to carry out these communications and threats. Based on my training and experience, individuals can access social media platforms on various electronic devices to include, cell phones, computers/laptops, tablets, etc.

THE TARGETS AND SUSPECT LOCATIONS

19. The following individual and location are considered the primary targets of the investigation, and are identified as follows:

a. **Richard LITTLE** (DOB: 7/17/1974), residing at 2824 Roosevelt Drive, Chambersburg, PA.

20. As set forth in detail in this affidavit, the investigation over the past several days has derived information from a) social media; b) physical surveillance; and c) law enforcement sources knowledgeable of the target and location.

21. Presented below is a brief description of the location and vehicle, with the detail and complete information constituting probable cause to search the location and vehicle presented below:

a. **2824 Roosevelt Drive** can be described as a single story, duplex, red brick exterior with a shed in the rear of the residence.

b. **Subaru Impreza, bearing, PA Registration 82022DV, VIN# 4S3GTAD61J3704444**, registered to Richard LITTLE at 2824 Roosevelt Drive.

PROPERTIES FOR WHICH AUTHORIZATION IS SOUGHT

22. The search warrant attached to this affidavit seeks authorization to search: **2824 Roosevelt Drive and Subaru Impreza bearing, PA Registration 82022DV, VIN# 4S3GTAD61J3704444**. As detailed throughout this affidavit, this property and vehicle are believed to contain evidence further described in Attachment B.

23. Your affiant submits that **LITTLE** has been engaged in a protracted course of conduct since at least April 4, 2024, to present, that has demonstrated by the investigation over the last several days has involved the location and vehicle for which I seek authority to search.

24. Given the facts and circumstances set forth above, your affiant believes that there is probable cause to search: **2824 Roosevelt Drive and Subaru Impreza, bearing, PA Registration 82022DV, VIN# 4S3GTAD61J3704444**, which is described more fully in Attachment A of each search warrant, for evidence, which is detailed in Attachment B of each search warrant.